



## OLSIA Anti-Terrorism-and-Anti-Money-Laundering-Policy

Organization of literacy support for independent Afghanistan

# 2025

## Contents

Board Approval .....	3
Background of the Organization .....	4
Our Vision: .....	4
Our Mission: .....	4
Goal .....	4
Humanitarian Principles:.....	4
Policy Statement.....	5
Scope .....	5
Responsibility & Dissemination.....	5
Definition .....	6
General Policy Guidelines and Principles .....	6
Governance Accountability and Transparency .....	7
Prevention Process .....	7
Financial Transparency .....	8
Reporting .....	9
Proceeds of Crime (Money Laundering) and Terrorist Financing Act.....	10
Violations or Breach of Policy .....	10

## Board Approval

The board of director of OLSIA, by resolution duly adopted by unanimous vote at a meeting duly called and held and not subsequently rescinded or modified in any way, has duly determined that this policy is workable and fair to and in the best interests of OLSIA, the board, approve this policy, recommended for use and directed that the amendment be submitted for consideration by OLSIA board members and ED at the OLSIA board meeting.

Each member of the board agrees to perform such further acts and execute such further documents as are necessary to effectuate the purposes hereof. This policy manual shall be understood and enforce in accordance with and governed by the laws of the government of Afghanistan.

The OLSIA Board Approval constitutes approval of this policy manual undersigned.

Abdul Qaum Almas

Signature

Fazal Rabani

Signature

Abdul Jabar Ameri

Signature

Farhad Naderi

Signature

Haroon Ahmadi

Signature



## Background of the Organization

The Organization of Literacy Support for Independent Afghanistan (OLSIA) was founded in 2024 with the conviction that education is the cornerstone of lasting peace, economic stability, and social inclusion in Afghanistan. Grounded in the belief that every person—regardless of age, gender or circumstance—deserves the opportunity to learn and grow, OLSIA is committed to building a brighter future for Afghan communities.

From its inception, OLSIA has positioned education as “first and for all,” directing its efforts toward increasing access to literacy, computer skills, vocational training and the English language. By mobilizing educated Afghan youth and partnering with local communities, OLSIA strives to overcome barriers that have long limited opportunities, especially among women and underserved populations.

Operating across multiple provinces, OLSIA implements projects that combine classroom learning with practical skill-building: establishing computer learning centers, delivering soft-skills training, and facilitating vocational pathways. These initiatives are designed not only to educate but to empower learners to participate meaningfully in the economy and society.

OLSIA’s vision is of a united and prosperous Afghanistan where development opportunities are accessible to all, thereby fostering social inclusion and stability. Its mission centers on building a collective movement of educated Afghan youth who champion education for all ages and all genders—with no discrimination. The ultimate goal is to enhance livelihoods, create economic opportunities, and contribute to the country’s long-term development.

Through transparent governance, community-centered design and partnerships that link education with employment, OLSIA seeks to ensure that every Afghan has a chance to unlock their potential. We believe that when people lead their own learning and development, the benefits ripple outward—strengthening families, communities and the nation.

## Our Vision:

A united and prosperous Afghanistan where education and development opportunities are accessible to all, fostering social inclusion and stability.

## Our Mission:

We aim to build a collective movement of educated Afghan youths to support education above all, education for all ages and all genders without any discrimination of any kind.

## Goal

To improve access to education, vocational skills, and economic opportunities, enhancing the livelihoods of Afghan communities and contributing to the country’s long-term development.

## Humanitarian Principles:

OLSIA is committed to the principles that are central to establishing and maintaining the provision of humanitarian response to the affected people in natural disasters and complex emergency situations  
[www.olsia.org](http://www.olsia.org) Cheknawry high school Street# 1, 7rd Zone, Jalalabad-Afghanistan

and/or implementation of human development interventions. The main humanitarian principles defined by UN have been adopted by OLSIA. The four core principles are:

- Humanity
- Neutrality
- Impartiality and,
- Independence

## Policy Statement

OLSIA is determined to prevent its funds, resources, and capacities from being used directly or indirectly for terrorist activities. The organization is similarly committed to preventing any proceeds of illegal activities from being funneled or laundered through OLSIA.

Funds and resources that are diverted to terrorist organizations or for criminal acts detract from OLSIA's mission and vision as they do not reach the organization's beneficiaries and further the likelihood of conflict.

The risk of any diversion of resources from OLSIA's mission represents a threat to the organization's reputation and mission and must be mitigated through recognized best practices. The objective of this policy is to prevent OLSIA from directly or indirectly funding terrorism, breaching sanctions, and being used as a vehicle for money laundering.

## Scope

OLSIA's mission requires the organization to work in conflict areas that present high risks for terrorism. In these areas, OLSIA works with local partner organizations, vendors, and consultants ("partners") to facilitate and advance its mission. OLSIA utilizes best practices to vet, monitor, and build strong relationships with partners in accordance with this policy to lower the risk of inadvertent diversion of resources. The policy applies to OLSIA's:

- a. Staff members and consultants worldwide.
- b. Service Providers, donors, and vendors.
- c. Board of Directors.

## Responsibility & Dissemination

This policy was prepared by the Executive Team and was approved by the Board of Directors. Staff and management alike are responsible for adhering to and actively supporting the implementation of this Policy.

This policy is openly available on OLSIA external and internal websites. All updates will be directly communicated to all of OLSIA's service providers, donors, and consultants. Critical checks in the policy are part of the recruitment process and onboarding for all new staff members. This policy is referenced in all legal agreements henceforth entered into as of the date of adoption with partner organizations, donors, consultants, and vendors.

## Definition

Definition According to the Criminal Code of Afghanistan, a Terrorist Activity is generally defined as an act or omission, inside or outside of Afghanistan, committed for a political, religious, or ideological purpose that is intended to intimidate the public, or a subset of the public, with respect to its security, including its economic security, or to compel a person, government or organization (whether inside or outside Afghanistan) from doing or refraining from doing any act, and that intentionally causes one of a number of specified forms of serious harm, such as causing death or serious bodily harm.

This can also include conspiracy, attempt or threat to commit, or being an accessory after the fact or counseling in relation to any such act.

Under Afghanistan law, a money laundering offense involves various acts committed with the intention to conceal or convert property or the proceeds of property (such as money) knowing or believing that these were derived from the commission of a designated offense.

In this context, a designated offense means the most serious offenses under the Criminal Code or any other federal Act. It includes, but is not limited to those relating to illegal drug trafficking, bribery, fraud, forgery, murder, robbery, counterfeit money, stock manipulation, tax evasion, and copyright infringement.

A money laundering offense may also extend to property, or proceeds derived from illegal activities that took place outside Afghanistan.

## General Policy Guidelines and Principles

1. OLSIA does not permit nor condone any form of Terrorist Activity or Facilitation of Terrorist Activity or of a Terrorist Group, either through the activity of OLSIA itself or through its Donors, Participants, or Service Providers.
2. OLSIA shall carry out all of its obligations under the Anti-Terrorism Legislation that may be in force from time to time promptly, diligently, and accurately.
3. Staff members and its Service Providers shall fully co-operate with the Anti-Terrorism Policy of OLSIA in submitting any reports required by Anti-Terrorism Legislation to the relevant authorities, in any investigations which may result from such a report or from a report under the provisions of this Policy, or in any investigations which may be commenced by a local or national police authority having jurisdiction over such matter.
4. In pursuing activities on behalf of OLSIA, Staff Members and Service Providers are to be informed that a Complaint by a member of the public or by a foreign individual, organization, or government could form the basis of an investigation into OLSIA activities and the initiation of de-registration of OLSIA' charitable status.
5. Consequently, Staff Members and Service Providers shall be encouraged to take care to conduct their activities in such a way as to ensure that OLSIA reputation is, as much as possible, beyond reproach.
6. Where there is concern about the possibility of non-compliance or liability under applicable Anti-Terrorism Legislation, the Executive Team shall promptly seek legal advice and review such advice with the Board.

**Responsibilities under this Policy is in addition to any responsibilities under the following related policies:**

- Accountability to Affected Populations Policy
- Anti-Fraud and Anti-Corruption Policy
- Code of Conduct
- Finance Manual
- Whistleblower Policy

Where any of the preceding policies conflict with this Policy, this Policy shall have precedence.

## Governance Accountability and Transparency

1. While fully respecting the individual privacy rights, OLSIA should maintain records of identifying information for the members of the governing boards of any Service Provider organizations receiving funds from OLSIA.
2. OLSIA shall verify, to the extent possible, that the members of the governing boards are not included on the Listed Entities.
3. While fully respecting the individual privacy rights, OLSIA should maintain records of identifying information for employees working abroad for OLSIA. OLSIA shall verify, to the extent possible, that the key employees are not part of any terrorist entity.
4. Maintenance of the information obtained under this section shall be maintained in accordance with OLSIA's Privacy Policy.

## Prevention Process

OLSIA has the following measures in place to reduce the risk of accidental and deliberate funding of terrorism or money laundering:

### 1. Due Diligence on partners, vendors, and donors:

OLSIA's Partnership Policy and Local Partner Management Guidelines prescribe the limitations to the type of Service Provider organizations with whom OLSIA will cooperate. For all prospective Service Providers, an organizational questionnaire is completed and submitted by the prospective partner along with copies of their recent audited statements, articles of incorporation, evidence of registration, copies of government filings, and recent annual reports.

Capacity and risk assessments of the prospective partner are undertaken by OLSIA to determine any possible risks of working with this partner.

To ensure OLSIA does not enter into financial relations with terrorist or criminal organizations

2. **These checks on organizations and individuals will be conducted and documented by OLSIA staff.**
  - i. Non-institutional donors never decide to which organizations or individuals their funds are paid. If a prospective Service Provider risk assessment reveals potential risks in relation to terrorism or money laundering, OLSIA will not consider a partnership with that organization.
  - ii. **Code of Conduct:** OLSIA requires all of its Employees, Consultants, Directors or Volunteers to comply with its Code of Conduct who are required to sign OLSIA's Code of Conduct on joining the organization or signing a contract with OLSIA.
  - iii. The Code of Conduct specifically mentions that staff and contract partners should contribute to preventing unethical and criminal activities. All Service Providers are expected to have their own Code of Conduct which meets or exceeds the standards outlined in OLSIA's Code of Conduct.
  - iv. **Audit Committee:** OLSIA's Board of Directors established the Audit Committee to assist the Board and the Organization by reviewing the organization's financial statements and its internal controls. This Committee guides, monitors, and approves audit functions and assists the Board in determining and mitigating risks to the organization's strategic objectives.
  - v. **Policies and Procedures:** Staff in all locations are required to follow OLSIA's policies for functions in the areas of finance, procurement, and administration.

## Financial Transparency

1. OLSIA and its Service Providers shall maintain and be able to present full program budgets and reports that account for all program expenses. These budgets shall indicate how the money is to be used. Independent auditing of Programs should be conducted, where practical, either by OLSIA's external auditors or by a qualified independent consultant.
2. OLSIA shall account for all funds received and disbursed in accordance with generally accepted accounting principles.
3. OLSIA shall promptly deposit all received funds into an account maintained by OLSIA at a financial institution. OLSIA should, as much as possible, make disbursement by cheque or wire transfer rather than in currency whenever such financial arrangements are reasonably available. Where OLSIA must disburse currency, OLSIA should disburse the currency in the smallest increments as possible that are sufficient to meet the immediate and short-term needs of specific programs.
4. Solicitations shall accurately and transparently tell donors the purpose(s), if applicable, for which donations are being collected.
5. Responsibilities in key financial processes shall be separated among several employees rather than entrusted to one employee. Signatures and/or system workflow approvals shall be required at different stages in any financial transaction process in order to avoid unauthorized transactions.

## Reporting

1. If any Participant or Service Provider of OLSIA becomes aware, whether personally or through a third-party complaint, of any connection or allegation of a connection to a Terrorist Activity or a Terrorist Group of any Program of OLSIA or of any Participant, Service Provider, or Donor of OLSIA, that Person shall promptly report such Complaint to the Senior Management within their respective country of operation or submit the information through OLSIA's secure and anonymous reporting tool through [www.olsia.org](http://www.olsia.org).

The secure reporting tool sends submissions directly to the Executive Team. Reports made to Senior Management either in Afghanistan or outside of Afghanistan shall be immediately forwarded to the Executive Team.

2. Upon receipt of a Complaint, the Executive Team shall review the Complaint and seek legal advice regarding any further action that may be required. The Executive Team shall promptly and thoroughly review such Complaint and legal advice received with the Board and in the event that further action is required, the Board shall proceed in consultation with legal counsel.
3. In the event that the results of any review under this Policy raise substantive concerns about any aspect of OLSIA' operations in relation to Anti-Terrorism Legislation, the Executive Team shall inform the Board as soon as possible. Upon receipt of such a report from the Executive Team, the Board shall promptly seek legal advice regarding its position and any legal obligation it may have to report the results of the review, including the advisability of making voluntary disclosure to the Office related.
4. Nothing in this Policy shall derogate from or supersede the rights or obligations of the Person initiating the Complaint to make any other report to the relevant authorities pursuant to applicable Anti-Terrorism Legislation.

## Proceeds of Crime (Money Laundering) and Terrorist Financing Act

1. OLSIA shall review all financial transactions carefully to determine, to the extent possible, that such transactions do not contravene the Proceeds of Crime (Money Laundering) and Terrorist Financing Act or any amendment thereof. If there is a concern about the integrity of a transaction as identified below, the Executive Team shall review the transaction and seek legal advice as necessary.
2. OLSIA shall review all transactions carefully to determine, to the extent possible, that they do not involve a Listed Entity, an individual or group whose assets have been, or an entity on the Terrorist Exclusion List. OLSIA shall review all large and unusual transactions carefully to determine whether such transactions are suspicious or otherwise require the review of the Executive Team.
3. If OLSIA is involved in the import or export of large amounts of cash or transactions that could be regarded as suspicious, it shall promptly seek legal advice regarding its obligation to report and shall promptly and accurately make any report that may be required under Anti-Terrorism Legislation.
4. Where there is a possibility that the activities of OLSIA could bring it within the scope of the definition of a “financial entity”, “money services business”, or other reporting entity for the purposes of the Proceeds of Crime (Money Laundering) and Terrorist Financing Act, the Executive Team shall seek legal advice regarding OLSIA’ status and any reporting obligations under the said Act.

## Violations or Breach of Policy

Violating this policy is a fundamental breach of the employment relationship and is subject to progressive disciplinary action, possibly leading to termination of employment.